

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Jane Doe 1, et al.,)
Plaintiffs,)
v.) 6:22-cv-02957-HMH
Varsity Brands, LLC, et al.,)
Defendants.)

DECLARATION OF JEFF WEBB

Pursuant to 28 U.S.C. § 1746, I Jeff Webb hereby declare as follows:

1. My name is Jeff Webb. I currently reside in Memphis, Tennessee. I am fully competent to make this declaration and this declaration based on my personal knowledge.
2. This declaration is submitted in support of the instant Motion to Dismiss for Lack of Personal Jurisdiction.
3. I do not own and have not previously owned any real or personal property within the State of South Carolina. I have never resided nor maintained a place of business in South Carolina, and have never had a business or personal office in South Carolina.
4. I have never had a bank account or other financial account in South Carolina. Nor have I ever had a South Carolina phone number.
5. I have never entered into a contract in South Carolina. I also have not entered into a contract that was to be performed in South Carolina or governed by South Carolina law. I have not personally earned revenue from any business transaction in South Carolina.
6. In at least the last thirty (30) years, I have only visited South Carolina once. In approximately 2018, I attended a political dinner in South Carolina and stayed overnight in the state. I have not otherwise spent time in South Carolina in that timeframe.
7. In 2020 I made a single payment to an individual I believe to reside in South Carolina. The purpose of the payment was for the individual to assist me in my work of authoring a book. The contemplated assistance was never provided and I have had no further business relationship with that individual.

8. In 1974, I founded Universal Cheerleaders Association, which later became Varsity Spirit, LLC ("Varsity"). I served as President and CEO of Varsity from its inception until stepping down from the CEO role on March 3, 2016. At that time, I continued as Chairman of the Board of Directors for Varsity until July 2018. After July 2018, I was no longer Chairman of the Board of Directors, but I continued to be employed by Varsity until December 2020. Effective December 2020, I am no longer a Varsity employee.

9. I currently serve as President of the International Cheer Union. International Cheer Union maintains its headquarters in Memphis, Tennessee. I maintain my office for International Cheer Union in Memphis, Tennessee.

10. At all times relevant to this suit, while serving as CEO, Chairman of the Board of Directors, or any other position for Varsity, I maintained my office at Varsity's offices in Memphis, Tennessee.

11. If called to testify to the truthfulness of the foregoing, I could competently and truthfully do so.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 16, 2022.


Jeff Webb